

From: Branning, Amy
Sent: Friday, August 17, 2018 07:24 PM
To: Beeler, Cindy; Marsh, Karen; Mia, Marcia
Subject: RE: NSPS-0000a Fugitive Emissions; change in compliance status

Maybe we can have a call to discuss this? Thanks.

Amy Huang Branning

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From: Beeler, Cindy
Sent: Friday, August 17, 2018 1:24 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Branning, Amy <Branning.Amy@epa.gov>
Subject: RE: NSPS-0000a Fugitive Emissions; change in compliance status

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

§ 60.5430a What definitions apply to this subpart?

Well site means one or more surface sites that are constructed for the drilling and subsequent operation of any oil well, natural gas well, or injection well. For purposes of the fugitive emissions standards at § 60.5397a, well site also means a separate tank battery surface site collecting crude oil, condensate, intermediate hydrocarbon liquids, or produced water from wells not located at the well site (e.g., centralized tank batteries).

Cindy Beeler
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From: Marsh, Karen
Sent: Friday, August 17, 2018 10:11 AM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Branning, Amy <Branning.Amy@epa.gov>
Subject: RE: NSPS-0000a Fugitive Emissions; change in compliance status

Some additional information:

The compressor station is between wellsite segment and processing. Specifically, gas from many wellsite locations is routed to this facility for treatment. At this facility, there was compression, an amine unit and glycol dehydration. Now that compression is gone, it is only amine treatment and glycol dehydration. Gas leaves and is sold. I would imagine it goes downstream for further processing.

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
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Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Beeler, Cindy

Sent: Thursday, August 16, 2018 6:28 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: NSPS-0000a Fugitive Emissions; change in compliance status

Ex. 5 Deliberative Process (DP)

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From: Marsh, Karen

Sent: Thursday, August 16, 2018 12:10 PM

To: Beeler, Cindy <Beeler.Cindy@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: NSPS-0000a Fugitive Emissions; change in compliance status

Thoughts on this one?

Karen R. Marsh, PE

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Jamie Nease [mailto:jnease@hlpengineering.com]

Sent: Thursday, August 09, 2018 12:51 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: NSPS-0000a Fugitive Emissions; change in compliance status

Karen-

If a facility is applicable to the leak detection under 0000a is subject as a compressor station, and all compressors get removed, is the facility no longer subject to the leak detection portion of the rule since the site is technically no longer a compressor station.

Thanks!

Jamie N. Nease

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